



## Buena Vista Water Storage District

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October 29, 2012

Mr. Robert Worl  
Project Manager  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**  
**08-AFC-8A**

TN # 68269

OCT 30 2012

Re: Support for the HECA Project's Use of Buena Vista Water Storage  
District's Brackish Water (CEC Docket No. 08-AFC-08A)

Dear Mr. Worl:

Buena Vista Water Storage District (District) would like to thank the California Energy Commission (CEC) for engaging the public and other interested parties throughout the Application for Certification process for the Hydrogen Energy California Power Plant Project (HECA). The District acknowledges the complex and challenging process the CEC undergoes when considering an applicant's certification along with the vast amount of data, information and public input that is necessary to analyze the benefits and impacts of the project.

Certainly one key aspect when considering project certification is the power plant's use of brackish water. As you are already aware, the District will be the supplier of the brackish water for the proposed power plant and the District has and continues to support the use of this brackish groundwater by HECA. The District's Brackish Groundwater and Remediation Project (BGRP) was developed as a component of the Buena Vista Water Management Program (FEIR – State Clearinghouse No. 2009011008) to help remediate the brackish groundwater issues in the District. By providing HECA with this brackish groundwater, Buena Vista will be able to implement a significant portion of the BGRP and improve the water quality of the underlying groundwater for the benefit of the farmers.

A significant way the BGRP will help improve the groundwater quality for the overlying farmers is that part of the BGRP is designed to strategically locate groundwater production wells on the west side of the District to intercept an influx of brackish groundwater (TDS > 2,000 mg/l) in the area of concern and allow better quality groundwater to infiltrate from east of the production wells. By shifting the mixing zone of the higher and lower TDS groundwater to the west, over time the groundwater quality to the east of the intercept wells will improve and help

provide farmers in the area of concern with more options regarding crop selection, irrigation management and irrigation facilities.

Fortunately for HECA, the vast region of brackish groundwater that impacts the western portions of the District is extensive and well beyond the capacity of the BGRP and therefore beyond the HECA requirements of up to 7,500 Af/yr. Under the currently proposed HECA project and its role within the BGRP, the groundwater improvements would only occur in the localized region to the east of the intercept wells and the groundwater benefits will only remain as long as the intercept wells are operating. The HECA project will never consume all brackish groundwater resources in the target areas of the BGRP, but it does create a demand for the brackish water which helps the District and the overlying landowners benefit from the BGRP.

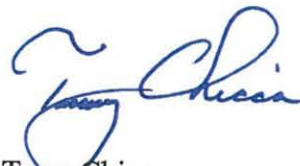
Additionally, the District carries a positive groundwater balance by annually recharging more groundwater (via canal seepage, irrigation percolation and intentional recharge activities) than what the District and its landowners annually extract (> 30,000 Af/yr). By recharging more groundwater than is pumped from the ground, the District has more than sufficient groundwater supplies to operate the BGRP intercept wells and sustain the improved groundwater quality. In short, the District will be recovering less than 25% of the volume of water that the District annually recharges to the aquifer.

The District and its Board of Directors fully stand behind its Brackish Groundwater Remediation Project and fully support HECA's use of the brackish groundwater that impacts farming operations and water management within the District. The District is fortunate to find a willing participant in the BGRP and hopes the CEC will approve HECA's use of the brackish groundwater supplied by the District.

Sincerely,



David Hampton  
Interim General Manager



Terry Chicca,  
President, Board of Directors

Cc: (Via Email)

Fred Puzzuto, Department of Energy  
Tom Daniels, Hydrogen Energy California